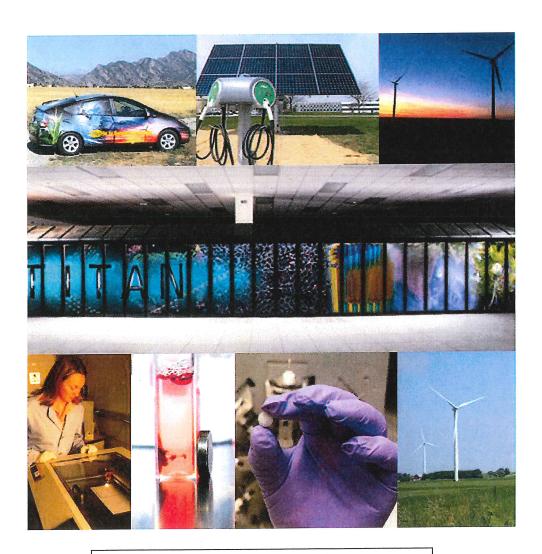


## TITLE IX COMPLIANCE REVIEW REPORT

# Purdue University Department of Physics



Office of Civil Rights
December 2016

### TITLE IX COMPLIANCE REVIEW REPORT

## Purdue University Department of Physics

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#### TITLE IX COMPLIANCE REVIEW REPORT

#### Purdue University Department of Physics

#### I. INTRODUCTION

During Fiscal Year 2014, the Office of Civil Rights (OCR) of the United States Department of Energy (the Department or DOE) conducted a Title IX compliance review of the graduate program of the Department of Physics at Purdue University, pursuant to Title IX of the Education Amendments of 1972 (Title IX), as amended, 20 U.S.C. § 1681, et seq., and the Department's Title IX implementing regulations, 10 C.F.R. Parts 1042 and 1040. During the course of the compliance review, the Department requested and obtained data from the University and conducted an onsite review. In April 2014, members of the Department's compliance review team held on-campus interviews with University administrators, including the University's Title IX Coordinator, and with students, faculty, and staff of the Physics Department. The facts, findings, and recommendations contained in this report are based on a review and an analysis of the data and background material obtained from the University, as well as information obtained from the interviews held with students, faculty, staff, and administrators.

#### A. Background

The Department supports a diverse portfolio of research at colleges, universities, and research institutions across the United States, providing funding to more than 300 such institutions every year. The funding provided by the Department for research at universities and colleges supports thousands of principal investigators, graduate students, and post-doctoral researchers.

Title IX and DOE Title IX implementing regulations prohibit recipients of federal financial assistance, such as universities and colleges, from discriminating on the basis of sex in any of their educational programs or activities. 20 U.S.C. § 1681(a) (2016); 10 C.F.R. § 1042.100 (2013). In addition, DOE Title IX implementing regulations require the Department to periodically conduct compliance reviews of recipients of DOE financial assistance to ensure compliance with the nondiscrimination requirements of Title IX. See 10 C.F.R. §§ 1042.605, 1040.101(a) (2013).

In July 2004, the Government Accountability Office (GAO) issued a report (GAO-04-639) entitled, "GENDER ISSUES: Women's Participation in the Sciences has increased, but Agencies Need to do More to Ensure Compliance with Title IX." The purpose of the report was two-fold: (1) to report on the status of women in the sciences; and (2) to evaluate the Title IX compliance activities of the four federal science agencies—the Department of Energy, Department of Education, National Aeronautics and Space Administration, and National Science Foundation. With respect to the status of women in the sciences, the GAO reported that the participation of women in the sciences at the undergraduate and graduate levels had increased over the past 30 years; however, the GAO reported that "[w]omen continue to major in the sciences and earn degrees in the sciences to a lesser extent than men." The GAO also noted that some studies suggest that sex discrimination may still affect women's choices and professional

progress in the sciences. With respect to the Title IX compliance activities of the four federal science agencies, the GAO found that the agencies had taken steps, through the conduct of complaint investigations and the provision of technical assistance, to ensure that the institutions to which they provide financial assistance are in compliance with Title IX. However, the GAO noted that "[g]iven the general lack of knowledge and familiarity with the reach of Title IX and the disincentives for filing complaints against superiors," the agencies needed to do more to judge whether sex discrimination exists in the sciences. To that end, the GAO made recommendations specific to each of the four federal science agencies. With respect to the Department, the GAO recommended that the Secretary of Energy ensure that compliance reviews of grantees are periodically conducted.

In August 2007, Congress passed, and the President signed into law, the America COMPETES Act, Pub. L. No. 110-69, § 5010, 121 Stat. 572, 620 (2007), which provided additional impetus for the Department to conduct compliance reviews. The Act states that the Department should (1) implement the recommendations contained in the GAO report, and (2) conduct at least two Title IX compliance reviews annually of recipients of DOE financial assistance.

The Department uses neutral criteria in selecting institutions to review in accordance with Title IX. DOE began conducting Title IX reviews in 2005 and at that time decided that they would be conducted on a rotating regional basis each year with the specific graduate discipline varying each year as well. For FY 2014, the 'Midwestern Region' consisting of the East North Central states of the Great Lakes Region, which includes Indiana was next in line for review. Purdue University, was selected because it had received the fourth highest level of funding (\$42.8M) for the previous three academic years in that region for the field of Physics, which was that year's chosen graduate study discipline. The three schools that had received more DOE funding for Physics in those years had undergone Title IX Reviews by other federal agencies in recent years and therefore were not chosen.

#### B. Objective

The objective of the Title IX compliance review at Purdue University was four-fold: (1) to determine whether male and female applicants, students, and faculty had equal access to the opportunities and benefits offered by the graduate program of the Department of Physics; (2) to determine whether the University was in compliance with the requirements of Title IX and DOE Title IX implementing regulations; (3) to identify and report on any promising practices instituted by the University for promoting gender equity and diversity; and 4) to identify and report on any areas of concerns and recommendations for improvement to promote equity between male and female applicants, students, and faculty.

#### C. Scope

At Purdue University, the OCR elected to review the graduate component of the Physics Department. To determine whether graduate applicants and students, regardless of their sex, had equal access to the opportunities and benefits offered by the Physics Department, the OCR evaluated the following areas and/or practices of the Physics Department: (1) student enrollment; (2) recruitment and outreach efforts; (3) admissions policies; (4) leave of absence and re-enrollment policies; (5) financial assistance opportunities; (6) graduate examination and

writing requirements; (7) the academic climate; and (8) student safety. To determine whether the University at large was in compliance with the requirements of Title IX and DOE Title IX implementing regulations, the OCR evaluated the following: (1) whether the University has designated a Title IX Coordinator; (2) whether the University has taken continuing steps to notify the campus community about its nondiscrimination policies related to Title IX; and (3) whether the University has adopted and published grievance procedures providing for the prompt and equitable resolution of Title IX-related complaints, including sex discrimination and sexual harassment complaints.

#### D. Methodology

DOE developed a Title IX Compliance Review Plan that included both written requests for information and data that was sent to Purdue prior to the compliance visit, as well as onsite compliance review activities. The Compliance Review Plan had two focal points for compliance assessment: 1) Title IX compliance requirements; and 2) program administration, which includes policies, procedures, and practices affecting the academic environment.

Pre-onsite review included a data and information request that was sent to the Purdue's Title IX Coordinator. The request covered a total of forty-six topical areas and sought copies of policies as well as statistical data related to students and faculty members for the academic years under review.

The DOE compliance team conducted an onsite review of the Purdue University Physics Department during April 15-17, 2014. The DOE compliance review team met with students and faculty in person to administer surveys that gathered respondent's individual opinions about their personal experiences in the Purdue Physics department, as well as at the University overall. In total, twenty-two faculty members, of which ten were female and twelve were male, were interviewed. In addition, twenty-seven students were interviewed, of which thirteen were male and fourteen were female.

During its visit, the compliance team also conducted interviews with the following Purdue University administrators, faculty members, and staff:

- Dean, College of Science
- Associate Dean, Graduate School
- Interim Dean of Students
- Physics and Astronomy Academic Advisor
- Director, Office of Institutional Equity
- Vice President for Ethics and Compliance/ Title IX Coordinator

The compliance review analysis provides an assessment of issues within the two focus areas of procedural compliance requirements and methods of program administration. Regulatory requirements and findings of fact are set forth as part of the compliance assessment under each main topic. The associated recommendations are intended to strengthen existing compliance activities. Promising practices associated with each of the compliance areas are also reported.

#### II. COMPLIANCE REVIEW OF PROCEDURES AND ENVIRONMENT

#### A. Student Enrollment

During the 2013-2014 academic year, 147 graduate students were enrolled in the Physics program. Of those students, 125 were male and twenty-two were female. As noted above, the compliance review team interviewed twenty-seven Physics Department students, including thirteen male students and fourteen female students, during its on-campus visit.

Table 1, below, shows the number and percentage of graduate male and female students enrolled in the Physics program for AY 2009-2010 to AY 2013-2014.

Table 1: Graduate Student Enrollment

	Total	М	ale	Fen	nale
2009-2010	148	123	83%	25	17%
2010-2011	143	120	84%	23	16%
2011-2012	148	126	85%	22	15%
2012-2013	151	128	85%	23	15%
2013-2014	147	125	85%	22	15%

According to data contained on the website of the American Institute of Physics, the gender breakdown for graduate Physics degrees awarded for the combined classes of 2010, 2011, and 2012 consisted of 23% being awarded to females and 77% being awarded to men. Although the graph above reflects enrollment at Purdue, not degrees awarded, Purdue enrollment numbers strongly indicate that Purdue's lower enrollment of females will result in graduate degree awards that will be well below the national average.

#### B. Faculty, Staff, and Administrators

The Physics Department has fifty-five full-time equivalent faculty members, of whom seven (13%) are female. The compliance review team interviewed twenty-two Administrators and faculty members, of which twelve were male and ten were female. These participants included several high level Administrators including Dean of the College of Science, Associate Dean of the Graduate School, Director of Institutional Equity, and the Vice President for Ethics and Compliance who also serves as the Title IX Coordinator.

During the 2013-14 Academic Year, the male-to-female faculty ratio for full Professors was thirty to four respectively; for Associate Professors the breakdown was fourteen males and two females; and for Assistant Professors the ratio was much more equal, with four males and three females. It is unclear whether the greater equality in the most junior faculty member positions is due to greater success in recruiting new female faculty members or if there are challenges to female advancement.

Purdue reported that the 'Physics Primary Committee (PPC)' made up of tenured Professors and Associate Professors whose home Department is Physics and Astronomy, is charged with initiating the process of nominating departmental colleagues for promotion and tenure. For the 2013-14 Academic Year, this would mean that the body recommending promotion and tenure consisted of forty-four males and six females. Purdue also reported that the PPC members make recommendations for promotion, tenure, and the level at which new faculty members will be hired by secret ballot. This decision process might disadvantage females in promotion, tenure, and hiring given that female faculty members are so underrepresented on the PPC.

Comments received during individual faculty interviews relayed that some female faculty members feel that the Department is "male dominated", and one faculty member was aware of at least one occasion where a male professor made "disparaging remarks regarding female faculty and students." However, overall respondent comments conveyed, that there is no perceived difference in how male and female faculty are treated. Examples of the University's efforts to support female students and faculty include the Women in Science Program (WSP), as well as the University's participation in NSF Advance Program grants that support the research activities and retention of female faculty members.

#### Findings and Recommendations

The information gathered shows that the Physics Department is committed to supporting women faculty members through the WSP and NSF Advance Programs. However, the larger representation of female faculty in the lower level faculty positions versus the fully tenured professorships raises concern. As previously stated, it is unclear whether this disparity is related to greater success in recruiting female faculty members in recent years or if there are challenges to female faculty advancement. DOE recommends that the Physics Department review data on its hiring and promotion decisions for the last five years to see if there is disparity between males and females. If disparity is found, the Physics Department may also want to examine its "secret ballot" process to determine if it is exacerbating the disparity.

#### C. Recruitment and Outreach

DOE Title IX implementing regulations prohibit recipients of financial assistance from discriminating on the basis of sex in the recruitment of students. 10 C.F.R. § 1042.310 (2013). To determine whether the Physics Department was in compliance with this provision, the OCR reviewed the recruitment and outreach activities of the Physics Department.

The University reported that it tries to increase awareness of the Physics program nationally by advertising in the American Institute of Physics Graduate Program Listing. The University stated that over the course of the five-year review period, it attended two conferences, the 'Big 10+ Grad Expo' and the Society for Advancement of Chicanos and Native Americans in Science (SACNAS) National Conference. Although the SACNAS Conference is known to have great ethnic diversity amongst attendees and women are well represented at this conference, the University offered no information on specific outreach efforts toward female students during their conference participation.

The University provided examples of letters to Purdue Alumni who are now on the faculty of other institutions asking for their help in identifying prospective Physics Ph.D. students. It expressed the institution's special interest in recruiting underrepresented students, including women.

All the graduate Physics students who were interviewed indicated that they were not actively recruited by the University and none of them were offered funding or other inducements to accept admission. A few students did attend the annual 'Purdue Physics Grad Prospect Open House' when they were deliberating whether to apply or enroll. This two-day event for admitted prospective students includes lab tours, poster sessions, panel discussions with graduate students and faculty, as well as social events.

#### Findings and Recommendations

The Department found no evidence of discrimination based on sex in the recruitment and outreach efforts of the Physics Department. Therefore Purdue's efforts meet the minimum nondiscrimination requirements of Title IX and DOE Title IX implementing regulations. However, the University reported very few focused efforts aimed at recruiting women students and could likely do more to increase the numbers of female applicants and enrolled students.

#### D. Admissions Process

DOE Title IX implementing regulations prohibit recipients of financial assistance from discriminating on the basis of sex in the admission of applicants. 10 C.F.R. § 1042.300 (2013). In determining whether an applicant satisfies a criterion for admission, or in making any offer of admission, recipients are prohibited from the following: giving preference to one person over another on the basis of sex; applying numerical limitations upon the number or proportion of persons of either sex who may be admitted; or otherwise treating one individual differently from another on the basis of sex. *Id.* 

#### 1. Background

Purdue has a centralized graduate admissions process that is administered by the Graduate School and mostly completed on-line. Therefore, individuals interested in pursuing a graduate Physics degree apply for admission through the Purdue Graduate School rather than through the Physics Department itself.

#### 2. Admissions Process

In order to be admitted to the Physics Doctoral program, an applicant must satisfy the minimum graduate admissions requirements of the Physics Department, which include:

- 1. Undergraduate cumulative grade point average of 3.0 or higher; and
- 2. Completion of the GRE general test and the GRE physics test

The University's standard practice in determining the number of new student admissions to make each year involves a meeting early in the spring semester between the Chair of the Graduate Admissions Committee, the Physics Department Head, the Associate Head for Academics, and the Assistant to the Head (who manages Teaching Assistants). The following topics are reviewed during this meeting: The current number of graduate students, the number expected to finish a degree before the next fall semester, the number of Teaching Assistants required for the next academic year, and the Physics graduate program budget line are reviewed to get the targeted number of research assistantships that faculty are willing to offer to incoming students. The number of new Teaching Assistants needed is determined and added to the number of fellowships available, as well as the number of research assistantships that faculty are willing to offer incoming students.

#### 3. Admissions Statistics

Table 2, below, shows the number and percentage of students, by sex, who applied and were admitted to the Physics Doctoral program from AY 2009-2010 to AY 2013-2014. The table also shows the total number of male and female students enrolled in the Physics program for the same time period.

<u>Doctoral Program—Applicants, Admissions, and New Enrollment per Academic Year</u>

Doctoral Program		M	ale	Female		
2000	No. of Applicants	229	78%	66	22%	
2009- 2010	No. Admitted	58	82%	13	18%	
2010	No. Enrolled*	123	83%	25	17%	
2010	No. of Applicants	260	80%	67	20%	
2010-2011	No. Admitted	46	82%	10	18%	
2011	No. Enrolled*	120	84%	23	16%	
2011	No. of Applicants	239	81%	57	19%	
2011- 2012	No. Admitted	54	77%	16	23%	
2012	No. Enrolled*	126	85%	22	15%	
2012	No. of Applicants	261	83%	52	17%	
2012- 2013	No. Admitted	53	79%	14	21%	
2013	No. Enrolled*	128	85%	23	15%	
2012	No. of Applicants	231	80%	56	20%	
2013- 2014	No. Admitted	48	76%	15	24%	
	No. Enrolled*	124	86%	21	14%	

<sup>\* &#</sup>x27;Enrolled' is overall students enrolled in the Physics program for that academic year, regardless of year of graduate study in the program. Therefore, number of 'enrolled' is greater than 'admitted' that year.

The table on the preceding page shows that for the two academic years beginning in 2009 and 2010, female applicants overall were less successful at being admitted into the Physics program than male applicants. Specifically in 2009 and 2010, while females made up 22% and 20% respectively of the overall applicant pool only 18% of those admitted were females. However, beginning in 2011 and continuing for the next two academic years female applicants were more successful at being admitted then male applicants were as the table shows.

During the five-year period under review, the admission rate for male student applicants ranged from a low of 18% for years two and three under review to a high of 25% for the AY 2009-2010. The admission rate for female students during the same period ranged from a low of 15% for AY 2009-2010 to a high of 28% for AY 2011-2012. The average admission rate for male applicants over the five-year period was 21%, while the average admission rate for female applicants over the same period was 23%, a difference of 2% in favor of female applicants.

Over the same five-year period, the enrollment rate for male students ranged from a low of 83% for AY 2000-2010 to a high of 86% for AY 2013-2014. The enrollment rate for female students during the same period ranged from a low of 14% for AY 2013-2014 to a high of 17% for AY 2009-2010. The average enrollment rate for male students over the five-year period was 79.2%, while the average enrollment rate for female students over the same period was 20.8%.

#### 4. Administrator Evaluation of the Admissions Process

A faculty member described the admissions ranking process this way: The twenty-page applications come in and applicants are grouped into 'qualified' and 'not qualified' applicants. At this point, a broader faculty peer review is conducted, and the top student applicants are taken to the Department Head to make the final determination on who will be offered admission and Teaching Assistantship funding. In general, twenty-thirty students are admitted per year. In total there are ten people that serve on the Admissions Committee.

Purdue provided no information on the gender make-up of the Admissions Committee, so DOE is unable to determine if there is gender equity in the decision making process for student admission and funding decisions.

#### 5. Student Evaluation of the Admissions Process

All student respondents answered 'no' to the question asking if there was anything in their recruitment and admissions experience that seemed unfair. Students provided no additional comments in the questionnaires or interviews regarding their admissions experience.

#### Findings and Recommendations

The Department has found no evidence of discrimination based on sex in the admissions process of the Doctoral program of the Physics Department, as described above. The Department has found no evidence that the Physics Department, in making admissions decisions related to applicants to the doctoral program, gives preference to one person over another based on sex, applies numerical limitations upon the number or proportion of persons of either sex who may be admitted, or otherwise treats one individual differently from another on the basis of sex.

Furthermore, beginning in AY 2011-2012, and continuing for the next two years, female applicants were admitted at a higher percentage than male students were. Therefore, the Department finds that the admissions process outlined above complies with the nondiscrimination requirements of Title IX and DOE Title IX implementing regulations.

#### E. Leave of Absence and Re-Enrollment Policies

DOE Title IX implementing regulations state that "no person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any academic . . . or other education program or activity operated by a recipient" of financial assistance. 10 C.F.R. § 1042.400 (2013). The Department evaluated the Physics Department's leave of absence and re-enrollment policies to determine whether they comply with this general provision of nondiscrimination on the basis of sex.

#### 1. General Leave of Absence and Re-Enrollment Policies

Each department at Purdue establishes policies on timely completion of a graduate degree program for that specific Department – thus there are no University-wide policies on timeliness of degree completion and leaves of absence. Rather, according to Purdue's website, each program sets its own time limits for Ph.D. degree completion that is reasonable and commensurate with the practice of scholarship in that field. The Physics department follows the timeliness of degree requirements set by the College of Science. This policy mandates that Ph.D. students must complete all degree requirements within seven years from entry into the graduate program, with an option for one additional summer term after the seven years has passed.

The Department does allow for a one-year extension beyond this timeline if requested by the student's Ph.D. Advisory Committee and approved by the Department's Graduate Committee. Any exceptions to this policy will require approval by the Department Head.

When asked to provide a copy of the Physics' Department's absence and/or leave policies and procedures for graduate students, Purdue responded "not applicable."

When asked to provide a copy of the University's re-entry policies and procedures, the University responded that "Re-entry is decided on a case by case basis." There was no additional information provided regarding what factors are taken into account when deciding whether or not to grant re-entry. Additionally, no information was provided on who makes a decision for re-entry or the process and timeline for decision making.

#### 2. Additional Requirements and Leave Options for Doctoral Degree Students

#### a. Continuous Registration Requirement

The DOE found no reference to a continuous registration requirement in the materials provided by the University. Although there was much detail provided on timeliness of degree completion requirements, it would seem that students are afforded flexibility in meeting course load and exam qualifications.

#### b. Time off for Childbirth and Adoption / Family Leave Policy

The University does not have a separate maternity/paternity leave policy for graduate students outside of paid parental leave that is available to benefits-eligible employees, which could include graduate students. To qualify, graduate students must have been employed by the University for at least one continuous year (12 months), half-time or more, in a benefits-eligible position. Graduate students may also qualify for FMLA leave related to maternity/paternity. Both these provisions for time off relate to continued salary eligibility while away, and do not address an extension of time to complete a degree.

#### Findings and Recommendations

Unlike most Universities that the DOE has reviewed, Purdue does not have formalized leave policies related to maternity/paternity or other reasons where a leave of absence might be needed as there seems to be no continuous registration requirement so that graduate students could take parental leave if desired, doing so would put them at a disadvantage to completing a degree within the seven-year timeline.

There are minimal ways to extend beyond the seven-year time requirement, but these exceptions require approval by the student's graduate committee and on occasion the Department Chair. This means that there is no guarantee that female students, who must take medical leave for child birth and who are usually the primary caregiver, will be afforded additional time needed to accommodate the birth or adoption of a child.

Therefore, the Department finds that the lack of guaranteed maternity/paternity leave will likely negatively impact female students and threaten their ability to complete their degree within the set timelines and therefore does not comply with the nondiscrimination requirements of Title IX and DOE Title IX implementing regulations.

#### F. Student Financial Assistance

DOE Title IX implementing regulations state that in providing financial assistance to any of its students, a recipient shall not, on the basis of sex, provide different amounts or types of such assistance, limit eligibility for such assistance, apply different criteria, or otherwise discriminate. 10 C.F.R. § 1042.430 (2013). The OCR evaluated the different types of financial assistance that the Physics Department makes available to its students, including financial recruitment incentives, to determine compliance with this provision.

#### 1. Teaching Assistantships and Research Fellowships

#### a. Selection Process

The Physics Department has a Graduate Admissions Committee, which in addition to selecting applicants for admission, also makes fellowship selections. The standard selection process begins early in the spring semester and includes an analysis of the current number of graduate students, the number expected to finish a degree before the next Fall semester, the number of Teaching Assistants required for the next academic year, and the graduate program budget line. The number of new Teaching Assistants needed is determined and added to the number of fellowships available as well as the number of research assistantships that faculty are willing to offer incoming students to get to the targeted number for the incoming class.

Staff members participating in this process are the Chair of Graduate Admissions Committee, the Department Head, the Associate Head for Academics, and the Assistant to the Department Head.

To aid students in determining research areas to pursue in future, the Department hosts informal events like luncheons to familiarize students with various areas of research. Typically, faculty members will hire students on a trial basis. Students enroll in the faculty member's class on an unpaid basis and if all goes well and the faculty member can secure funding, they will take the students on as a research assistant.

#### b. Distribution of Research/Teaching Assistantships and Fellowships

The table below shows the distribution of research and teaching assistantships and various fellowships among male and female graduate Physics students from AY 2009-2010 to AY 2013-2014. Over the five-year period, the percentage of awards to female students generally match their percentage representation of the overall Physics Department. For instance, in the five-year period under review, female students received between 13% to 16% of all graduate financial awards while their percentage of the Physics student body ranged from 14% to 17%.

#### Teaching/Research Assistantships and Fellowships

		7	[ <b>A</b>	I	RA		F	Total	%
2009-	M	83	89%	57	85%	8	72%	148	86%
2010	F	10	11%	_ 10	15%	3	28%	23	14%
2010-	M	69	90%	49	83%	7	58%	125	84%
2011	F	8	10%	10	17%	5	42%	23	16%
2011-	M	66	90%	62	87%	9	71%	137	87%
2012	F	7	10%	9	13%	4	29%	20	13%
2012-	M	66	86%	62	86%	9	69%	137	85%
2013	F	10	14%	10	14%	4	31%	24	15%
2013-	M	64	85%	_51	85%	7	78%	122	84%
2014	F	11	15%	9	15%	2	22%	22	16%

#### 2. Recruitment Incentives

The Physics Department notified the DOE that it does not offer recruitment incentives to prospective students who have been awarded admission.

#### 3. Achievement Awards

The Physics Department selects graduate students for achievement awards on an annual basis. Early in the spring semester the Department head issues a call for nominations and anyone may nominate a student, including self-nominations. Once the deadline has passed, four to five reviewers for each award are chosen.

For most years, the University did not provide gender breakdowns by award type. There are seven award types made to Physics Graduate students, one of which is dedicated to female students called the Lijuan Wang Memorial Award. Other awards include: George Tautfest Award, H.Y. Fan Award, Wedward Akeley Award, Akeley-Mandler Award, Dr. Warner Black Award, and the Karl Lark-Horovitz Award. Most awards carry a monetary prize of around \$200, however, the Karl-Lark Horovitz Award for Outstanding research carries a \$1000 prize.

The table below shows the distribution of achievement awards among male and female graduate Physics students for AY 2009-2010 to AY 2012-2013.

Total Awards Per Academic	Reci	pient
Year	M	F
FY 2009-10 Awards	8	2
FY 2010-11 Awards	4	3
FY 2011-12 Awards	5	0
FY 2012-13 Awards	5	3

#### Findings and Recommendations

Over the five-year period under review, teaching assistantships, research assistantships, and fellowship positions were generally awarded to male and female graduate Physics students in proportion to their population size. For instance, in the five-year period under review, female students received between 13% to 16% of all graduate financial awards while their percentage of the Physics student body ranged from 14% to 17%. While female awards percentages were slightly lower than their student population percentages, the difference is marginal and no negative inference can be drawn from the slight difference.

In addition, the Physics Department compensates male and female graduate Physics students equally for comparable graduate assistantships. The Department has found no evidence that the Physics Department, in selecting teaching assistants and research fellows over the five-year period, provided different types of such assistance, limited eligibility for such assistance, applied different criteria for such assistance, or otherwise discriminated on the basis of sex in providing such assistance. Therefore, the Department finds that the Physics Department's teaching

assistant and research fellowship selection processes described above comply with the nondiscrimination requirements of Title IX and DOE Title IX implementing regulations.

Regarding achievement awards, for three of the four years that data was supplied for, female students received a significantly higher percentage of awards than their student body representation. For instance in AY 2010-2011 women received 43% of achievement awards and in FY 2012-2013 women received 37% of awards. In 2009-2010 awards to women were close to their student body representation at 20%. However in 2011-2012, no women received an achievement award. There was no additional documentation provided to DOE that explains why 100% of awards went to men this year, but given the overrepresentation of females in the other three years, DOE assumes this to be an unintentional anomaly.

The Department has found no evidence that the Physics Department, in selecting recipients for achievement awards, provided different types of such assistance, limited eligibility for such assistance, applied different criteria for such assistance, or otherwise discriminated on the basis of sex in providing such assistance. Therefore, the Department finds that the Physics Department's nomination/selection process for achievement awards described above complies with the non-discrimination requirements of Title IX and DOE Title IX implementing regulations.

## G. Ph.D. Degree: Qualifying Examination, Oral Candidacy Examination, and Dissertation Requirements

DOE Title IX implementing regulations at 10 C.F.R. § 1042.400 (2013) state that "no person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any academic, extracurricular, research, occupational training, or other education program or activity operated by a recipient" of financial assistance. The Department evaluated the Physics Department's administration of the oral candidacy examination, the dissertation defense, and the dissertation approval process to determine whether they comply with this general provision of nondiscrimination on the basis of sex.

#### 1. Background

The Ph.D. is the primary graduate degree offered by the Physics Department, and as a general rule, only applicants who are seeking a Ph.D. will be considered for admission. Incoming students must take a qualifying examination before registering for their first semester to assist with developing a course plan that will ensure he or she have the base knowledge to succeed in the program.

Ph.D. students are required to take a set core curriculum and maintain at least a 3.0 GPA on a 4.0 scale. After students have passed the qualifying examination and completed the entire core curriculum courses with a 3.0 GPA or above, the Graduate Committee will automatically recommend that the student be certified to register for Ph.D. research. This certification normally happens at the end of the third or fourth semester.

If a student has not been certified within three calendar years from the date of first entry as a graduate student, they will be certified only if the Graduate Committee deems that there are serious extenuating circumstances such as financial hardship or a death in the family. If an extension is granted, it will be no longer than one additional year.

After being certified, the student prepares and files a Ph.D. "Plan of Study" and arranges for a meeting with the Preliminary Examination Committee to approve the plan. The remaining steps to degree completion are discussed in detail in later sections.

#### 2. Qualifying Exam Requirement and Passage Rates

The Physics Department requires all incoming graduate students to take qualifying exam before their first semester as a Purdue Graduate student. The exam helps determine the students' Departmental Plan of Study, which focuses on topics the students will need to master in order to be successful in their required coursework. If students do not achieve a passing grade after three attempts, the Department deems this sufficient evidence to deny candidacy for the Ph.D. degree. Students may then still be eligible for a Master's degree.

The table below shows the total number of students by gender that qualified to take the qualifying exam for each year under review, as well as the passage rates for the same period. For both genders, the passage rate varied greatly each year. Specifically, male students lowest passage rate was 18% in 2013-2014 and the highest was 50% in 2012-2013. Female students lowest passage rate was 0% in 2012-2013 and the highest was 50% for two academic years beginning in the fall of 2010 and 2011. But on average the passage rate over the five-year review period was extremely close, with males passing at 33.6% on average and females passing 33% of the time.

One faculty member, who is co-chair of the Qualifying Exam Committee, shared efforts to remove any and all aspects of bias from the qualifying exam process. When students provide answers to questions, they use an assigned number, instead of their name, so that their gender is unknown to the grading professor. Furthermore, if a student appeals his or her grade, the Committee co-chair acts as an intermediary and the appealing student's gender is never known to any of the graders.

	No. of Students Eligible to take Exam		the second of the second of the San	L 10-8, 1, 78,69-1 (92,911-47)	Students assing	Female Students Passing	
Academic Year	Total	Male	Female	No.	Percent	No.	Percent
2009-2010	31	26	5	8	31%	2	40%
2010-201 I	21	19	2	4	21%	1	50%
2011-2012	27	23	4	11	48%%	2	50%
2012-2013	21	18	3	9	50%	0	0%
2013-2014	21	17	4	3	18%	1	25%

#### 3. Ph.D. Degree Requirements:

After being certified, the student prepares and files a Ph.D. "Plan of Study" and arranges for a meeting with the Preliminary Examination Committee to approve the plan. Within six months following certification, the student's Preliminary Examination Committee must meet to decide on the nature, coverage, and timing of the student's examination.

The examination may have written and oral portions, but there is no standard department-wide preliminary examination. The student must take the examination for the first time within six months of the initial meeting of the Preliminary Examination Committee. A student who fails the examination on the first attempt may be granted a second try by the Preliminary Examination Committee. Appeals of the Committee's decisions may be made to the Graduate Committee.

In addition to required coursework, all students are required each term to complete training assignments which vary depending upon the needs and professional aspirations of the student. These assignments increase in level of complexity and responsibility as students progress through their program. These assignments are designed to supplement coursework by incorporating pre-professional activities such as assisting in research and teaching. Also, students are expected to regularly attend departmental colloquia and seminars in their specialty area.

#### a. Dissertation Research and Publication

Students are required to set research goals and review progress toward the goals with a major professor at least on an annual basis in accordance with the procedures required by the College of Science. Upon completion of the research, the thesis is written, the text of which is subject to approval by the major professor and its format subject to the regulations of the Department and the Graduate School. The thesis material is prepared for publication in a scientific journal, and this is an essential requirement for the degree.

#### b. Dissertation Defense

The final oral examination, or dissertation defense, covers the thesis, the primary and related areas. The Examination Committee consists of at least four members and usually mirrors the student's Advisory Committee, however, the Dean of Graduate School reserves the right to appoint additional members to the examining committee.

The table below shows the number of Physics Ph.D. degree students who submitted their dissertations for approval from AY 2009-2010 to AY 2013-2014, as well as the number and percentage of dissertations that were approved. The table also shows the number of Ph.D. degree students who defended their dissertations before the thesis committee, as well as the number and percentage of students who successfully defended their dissertations. As Table 5 illustrates, the dissertation approval rate and dissertation defense passing rate for both male and female students over the five-year period was 100%.

#### Dissertation Defense Success Rates and Dissertation Approval Rates

	No, of Defenders/ Submissions			Male Students Passing		Female Students Passing	
Academic Year	Total	Male	Female	No.	Percent	No.	Percent
2009-2010	18	16	2	16	100%	2	100%
2010-2011	16	14	3	14	100%	3	100%
2011-2012	9	8	1	8	100%	1	100%
2012-2013	26	20	6	20	100%	6	100%
2013-2014	19	18	1	6	100%	1	100%

#### Findings and Recommendations

The DOE found no evidence of discrimination on the basis of sex in the Physics Department's administration of the qualifying examination, the dissertation defense, or the dissertation approval process for Ph.D. students, as described above. Therefore, the Physics Department's policies related to these areas comply with the nondiscrimination requirements of Title IX and the DOE Title IX implementing regulations.

#### H. The Environment: Academic Climate and Campus Safety

As noted previously, DOE Title IX implementing regulations at 10 C.F.R. § 1042.400 (2013) state that "no person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any academic, extracurricular, research, occupational training, or other education program or activity operated by a recipient" of financial assistance. Consistent with this provision, the Department evaluated the academic climate within the Physics Department, as well as campus safety, to determine whether either of these environmental aspects had the effect of excluding Physics students from participating in Physics programs or activities on the basis of their sex.

#### 1. Academic Climate

The OCR review team asked graduate Physics students whether they believed that their sex had affected any aspect of their study at the University. An overwhelming majority of the students and faculty interviewed stated that their sex had not affected their studies or work at the University. However, a female student did share that because women are severely underrepresented in the program, male students commonly ask them out. She did not think this was a serious problem because it has been her experience that if the invitation is declined, the male students will accept the answer and it will not have any negative consequences going forward.

Additionally, some felt that female students must have more confidence than male students in day-to-day interactions because they frequently are the only female in a classroom. They must also be "aggressive" to get their ideas across whether this is natural to them or not, because men are aggressive in how they communicate and women will get talked over if they are not as well.

On a positive note, the Department hosts a monthly mentoring session for female students that is associated with the "Women in Physics Program."

When graduate Physics students were asked whether the sex of a student affected the dynamics between male and female students in the classroom, a majority of them said, "no" and indicated that the differences in how students interact with each other and faculty is based on personal differences that are not related to gender. Two male students thought that female students received perks based on their gender such as a window office, and they noted that there were female-specific fellowships that men were not eligible for.

When graduate Physics students were asked whether one's sex affected the dynamics between professors and students in the classroom, a majority of them said "no," but many acknowledged that the lack of female role models may make women feel uncomfortable and hinder their ability to develop confidence as a graduate student or future faculty member. There was mention of efforts by "several senior members of the faculty" to actively educate about gender bias and how it can arise, but overall faculty sensed that any biased outcomes do not stem from bad intentions.

One professor offered that it has been his experience that his students have always worked well together, and always done so in a gender-mixed group. He added that his students must work well together to be effective, and he chooses students who are compatible with each other.

One female faculty member stated that she thinks there may be gender-related challenges in generating funding through the peer review process because she suspects that being female negatively impacts funding decisions when she is listed as the principal investigator on a proposal. Additionally, the Purdue Advance Team conducted a study to see if there were differences in how female faculty members were rated by students. Overall, female faculty members regularly were rated lower than their male counterparts. At the time of the compliance review, there were no additional findings or insights related to this study.

#### 2. Campus Safety

The OCR review team asked graduate Physics students and faculty whether they believed the campus and surrounding environment were safe. Overwhelmingly the responding University staff and students indicated that they felt the campus was safe. Many specifically mentioned that the University is located in a smaller town that is safer than many schools located in urban areas. Additionally, the presence of night escorts, secure buildings, and emergency phones were mentioned by many as fostering a safe campus environment.

#### Findings and Recommendations

The Department finds that a majority of the graduate Physics students who were interviewed believed that their sex had not affected any aspect of their study at the University; that the sex of a student did not affect the dynamics between male and female students in the classroom; and that one's sex did not affect the dynamics between professors and students in the classroom. Female underrepresentation did lead to some undesired circumstances, although they were unintended, such as female students being asked out by male students and an overall male-

dominated atmosphere in which female students had to be more aggressive than they normally would be to have their ideas heard.

The OCR found that students or faculty were not concerned about campus safety. Overall, the OCR finds the Graduate Physics Department to be in compliance with DOE Title IX implementing regulations as it relates to these areas.

#### III. COMPLIANCE REVIEW OF TITLE IX REQUIREMENTS

#### A. Title IX Coordinator and Notice Requirements

#### 1. Designation of a Title IX Coordinator

DOE Title IX implementing regulations require each recipient of financial assistance to designate at least one employee to coordinate its efforts to comply with and to carry out its responsibilities under Title IX and DOE Title IX implementing regulations. 10 C.F.R. § 1042.135(a) (2013).

The University has designated the Vice President for Ethics and Compliance to be its Title IX Coordinator. The Vice President is responsible for (among other functions): monitoring compliance with federal equal opportunity and affirmative action regulations, including Title IX; developing system-wide policies pertaining to equal opportunity, equal access, and affirmative action in cooperation with university officers; and coordinating the resolution of all discrimination complaints filed with external agencies and overseeing and coordinating internal discrimination grievance procedures in consultation with university officers, chancellors, and legal counsel.

#### 2. Notification Requirements of Title IX

DOE Title IX implementing regulations require each recipient of financial assistance to notify all of its students and employees of the name, office address, and telephone number of the individual it has designated as the Title IX coordinator. 10 C.F.R. § 1042.135(a) (2013). DOE Title IX implementing regulations also require each recipient of financial assistance to implement specific and continuing steps to notify applicants for admission, students, and employees "that it does not discriminate on the basis of sex in the educational programs or activities that it operates, and that it is required by Title IX and [DOE] Title IX regulations not to discriminate in such a manner." 10 C.F.R. § 1042.140(a)(1) (2013). In addition, each recipient is required to prominently include a statement of its nondiscrimination policy on the basis of sex in each announcement, bulletin, catalog, or application form that it makes available to applicants for admission, students, and employees, or which is otherwise used in connection with the recruitment of students or employees. 10 C.F.R. § 1042.140(b)(1) (2013).

The University has adopted a policy on equal opportunity, a nondiscrimination statement, and a sexual harassment policy. The University's Non-Discrimination Policy "prohibits discrimination against any member of the University community on the basis of race, religion, color, sex, age,

national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, disability, or status as a veteran."

The University states that it takes several actions to make students, faculty, and staff aware of the requirements of Title IX and of the Title IX complaint process. The University's non-discrimination policy is published on its website, and there are postings of the policy in many places around the campus. Additionally, the University stated that commencing with the 2014-15 Academic Year, the Department Head would send an annual message to the faculty, staff, and graduate students at the beginning of the Academic Year informing them of 1) the name, office address and telephone number of the Title IX Coordinator; 2) information regarding the University's policies and procedures regarding Title IX and its prohibition against sex discrimination; and 3) information about where complaints of discrimination or harassment may be filed.

Additionally, the Title IX Coordinator will meet with graduate and undergraduate student leaders and representatives of faculty and staff to identify additional methods of communicating with students, faculty, and staff regarding the requirements of Title IX and DOE's Title IX Implementing regulations.

#### 3. Student and Faculty Awareness of Title IX and the Title IX Coordinator

In general, most students and staff interviewees were aware that Title IX was related to gender discrimination, but there was not much knowledge beyond this in regard to statute specifics or the University's policies and procedures related to Title IX compliance, including complaint processing. For this reason, the DOE sent a follow-up letter to the Department conveying the following three specific concerns: 1) students and staff were not aware of the identity of the Title IX Coordinator; 2) there were no continuous procedures for notifying students and staff of the prohibition of sexual discrimination; and 3) the University needed to publish grievance procedures that provide for prompt and equitable resolution of student and employee complaints related to Title IX.

Shortly after receiving the DOE concerns above, the University provided a follow-up memorandum that outlined the additional steps it would take to address DOE's concerns which are outlined in the section above titled, 'Notification Requirements of Title IX.'

#### B. Title IX Complaint Procedures and Processes

DOE Title IX implementing regulations require recipients of financial assistance to adopt and publish grievance procedures providing for the prompt and equitable resolution of student and employee complaints related to Title IX. 10 C.F.R. § 1042.135(b) (2013).

#### 1. Background Information on the University's Title IX-Related Complaint Procedures

The following procedures consist of the University's policies that apply to all complaints of discrimination and/or harassment, whether the parties are students, recognized student organizations, employees, campus visitors, or persons participating in a University activity. A

complainant may have an advisor or support person present when reporting discrimination and/or harassment or at any point in the process. The management of all complaints of discrimination and/or harassment, regardless of where they are initially received, and the implementation of these procedures, is the responsibility of the Vice President for Ethics and Compliance.

#### 2. Informal Resolution Process

To file an Informal Complaint, a complainant must: 1) notify a contact person within 120 days of the incident of discrimination or harassment or, where the discrimination or harassment is of an ongoing nature, within 120 days from the most recent incident; and 2) sign a completed information form. Within three days of the receipt of a signed information form, the contact person must: 1) forward a copy of the signed Complaint Information form to the Office of the Vice President for Ethics and Compliance; and 2) either attempt to resolve the Informal Complaint or refer the matter for resolution to another contact person.

The Informal Resolution Process is designed to empower the parties to reach a mutually satisfactory agreement. The Informal Process will be concluded by one of the following: 1) a decision to stop further action on the Informal Complaint; 2) a resolution of the Informal Complaint by agreement of the parties; or 3) initiation of the Formal Resolution Process.

#### 3. Formal Resolution Process

To be considered properly received, a Formal Complaint must be filed with the appropriate Chancellor or the Director by the Complainant within the earlier of ten days of the conclusion of the Informal Process or 120 days following the incident of discrimination and/or harassment. Within ten days following receipt of a Formal Complaint, the Chancellor or Director will assign a University Investigator to investigate the Formal Complaint. Persons eligible to serve as University Investigators shall be designated by the Vice President for Ethics and Compliance. Respondent(s) will be requested to respond in writing to the Formal Complaint within a reasonable time, not to exceed ten days from the date of certified or express mailing or hand delivery of the notification of the Formal Complaint.

After notifications and responses are received, the appointed University Investigator will interview the parties. The Investigator will then notify the University within three days of the interviews, whether the complainant's allegations, if substantiated, would constitute a violation of University policy. If the allegations would not constitute a violation of University policy, the University will issue written notice of dismissal.

In the event that the Investigator finds that the allegations do constitute a violation of University policy, a thorough fact-finding investigation will be conducted and completed within thirty days following the assignment of the Formal Complaint to the Investigator. Within seven days of the investigation's conclusion, a written report will be delivered to University leadership which will include a finding as to whether University policy was violated.

Within fifteen days from the written report being filed, University leadership will convene the Advisory Committee on Equity to review the findings and provide input to the final

determination of University leadership in the matter which will be rendered within ten days of the Committee meeting.

If a violation is found, sanctions will be determined on a case-by-case basis and will be in accordance with University policy. The University also has a policy for 'Enhancement of Sanctions' when the discrimination or harassment are motivated by bias based on a person's race, gender, religion, color, age, national origin, ancestry or disability.

The Complainant and Respondent each have the right to appeal the decision to the Chancellor or Director and this must be done within twenty days of the issuance of the final decision. Additionally, the University's published complaint procedures notify students and staff that they may also file a complaint to the Indiana Civil Rights Commission or to the Equal Employment Opportunity Commission if their complaint alleges discrimination based on a protected class status which includes gender.

#### 4. Title IX-Related Concerns/Complaints

During the on-site visit, several students mentioned that gender may play a role in the experience that a student may have in the graduate program. However, these were categorized as unintentional outcomes of innate gender differences such as male students being more assertive in a classroom environment. A female student also mentioned male students often asked them out on dates because women were so underrepresented in the program. This was described more as a nuisance that was easily rebuffed rather than an occurrence that made female students feel uncomfortable or offended.

#### 5. Student and Faculty Awareness of Title IX-Related Grievance Procedures

Many of the graduate Physics students who were interviewed were unfamiliar with the procedures for filing a discrimination complaint, and did not know where specifically to go to file a complaint of discrimination. Also, a majority of the Physics faculty members who were interviewed indicated that they were not familiar with the procedures for filing a discrimination complaint.

The first preliminary observation related to the requirement that each recipient notify all of its students and employees of the name, office address, and telephone number of the individual it had designated as the Title IX coordinator. 10 C.F.R. § 1042.135(a) (2013). The OCR notified the University that many of the students and faculty who were interviewed were not aware that the University had a Title IX Coordinator. Therefore, the OCR requested that the University identify methods for increasing awareness about the existence of the University's Title IX Coordinator and for informing students and employees of the Title IX Coordinator's name, office address, and telephone number.

In response to the first observation, the University notified DOE that it had posted information with the name, office address, and telephone number of the Title IX Coordinator in various locations in the Physics building. Additionally, the University announced that beginning in the 2014-2015 Academic Year it would send an annual message to faculty, staff, and graduate

students with the Title IX Coordinators contact information.

The second preliminary observation related to the requirement that the University implement specific and continuing steps for notifying applicants for admission, students, and employees, among others, about Title IX's prohibition against sex discrimination. 10 C.F.R. §§1042.140(a)(1), 1042.140(b)(1) (2013). The OCR informed the University that many of its students and faculty who were interviewed were not familiar with Title IX. Therefore, the OCR requested that the University enhance its methods for notifying students and faculty about Title IX and its prohibition against sex discrimination.

In response to this second observation, the again University stated it would institute an annual message to all faculty, staff, and students that will commence with the 2014-2015 Academic Year.

The third preliminary observation relates to the requirement that the University adopt and publish grievance procedures providing for the prompt and equitable resolution of student and employee complaints related to Title IX. See 10 C.F.R. § 1042.135(b) (2013). The OCR informed the University that many of the students and faculty who were interviewed were not aware of the procedures for filing a Title IX-related complaint or where to file such a complaint. Therefore, the OCR requested that the University identify methods for increasing awareness among students and employees about the University's Title IX-related grievance procedures and about where such complaints may be filed.

In response to this third observation, the University references the additional postings of Title IX Coordinator's contact information around campus as well as the annual message to faculty, staff, and graduate students that was scheduled to begin in the 2014-2015 Academic Year. Also, the University committed the Title IX Coordinator to meet with graduate and undergraduate student leaders and representatives of faculty and staff to identify additional methods of communicating with students, faculty, and staff regarding the requirements of Title IX, the Coordinator's contact information, and the right of an individual to file a complaint.

#### Findings and Recommendations

The Department finds that the University has instituted additional notification actions since the on-site visit, and proposes to carry out annual notices to all students, faculty, and staff to ensure proper notification of the Title IX Coordinator identity and complaint procedures. Also, the Department finds that the documented and published complaint procedures contained in the booklet published by the Office of Ethics and Compliance are very detailed and clear.

The Department recognizes that the University has taken some steps and proposes to take additional steps to notify students and employees of: (1) Title IX and its prohibition against sex discrimination; (2) the University's Title IX-related complaint procedures and where such complaints may be filed; and (3) the name, office address, and telephone number of the University's Title IX Coordinator.

At the time of the on-site review, the Department had one major area of concern about the absence of a maternal/paternal leave policy. As stated in greater detail on page nine of this document the Department finds that the lack of guaranteed maternity/paternity leave would likely negatively impact female students and threaten their ability to complete their degree within the set timelines. Therefore, in a draft report that was provided to the University in August 2016, DOE recommended that the University examine their existing policies related to maternity/paternity leave and modify the policy to minimize adverse impacts on female students. Upon receipt, the University reviewed the recommendations and developed the following new leave policy for graduate students which will take effect in 2017.

Below is the new leave policy that Purdue University will institute graduate students.

### **Department of Physics – Purdue University**

#### Voluntary Leaves of Absence for Graduate Students

A voluntary leave of absence provides graduate students with a means for temporarily interrupting their scholarly work in order to attend to one or more of the needs listed below.

- New parent/pregnancy
- Medical
- Military service
- Family obligation
- Financial hardship
- Other emergency

#### Eligibility and Limits

To be eligible for voluntary leave, the graduate student must have completed at least one semester in their program and be in good academic standing. A student who needs new parent/pregnancy leave is not subject to this prerequisite.

Leave for a student who is a new parent due to birth or adoption is limited to a maximum of six contiguous weeks. Leave for a student who has a pregnancy-related medical need is limited to the longer of (a) six weeks or (b) the period of time deemed necessary by the student's doctor.

Leave for all other reasons is limited to a maximum of one full academic year, including summer sessions. An extension may be requested as described below, but is granted only under certain extenuating circumstances. In cases where an extension is granted, it is limited to one additional full academic year, including summer sessions, for a total voluntary leave of two years.

#### **Procedures**

All requests for voluntary leave must be submitted by the graduate student to the assistant/associate dean with responsibility for graduate education in the College of Science.

Leave for New Parent/Pregnancy

- 1. The student must submit notice of the need for new parent leave as early as possible in the semester in which the leave will begin. The student will be required to provide appropriate medical (birth of a child) or adoption documentation. Leave for a new parent will normally begin within two weeks of the child's birth or adoption placement.
- 2. The student must submit notice of their need for a pregnancy-related medical leave within one week of the date on which the leave begins/began. The student will be required to provide appropriate documentation from their doctor.
- 3. During new parent/pregnancy leave, the student retains their enrolled student status.
  - a. Student visa status and loan repayment schedules are unchanged.
  - b. They may participate in their program as little or as much as they choose (for example: class attendance, research, clinical work, etc.).
  - c. They are eligible for academic accommodation for coursework requirements and deadlines, exams, research deadlines, etc.
- 4. Students who receive stipend support from University funds are entitled to continue receiving the support for a maximum of six weeks voluntary leave. Stipend support from government or external funds is subject to the funding agency's requirements.
- 5. In addition to the steps noted above, students who hold a graduate student staff appointment are required to follow the procedures for leave from their staff appointment in accordance with the policy on Paid Parental Leave (VI.E.3).

#### Leave for All Other Reasons

- 1. The request must be submitted no later than the second week of the semester for which the leave is being requested, or, if the need for leave is unforeseen, within one week of the date on which the leave began. The student will be required to provide appropriate documentation as applicable to the reason for the leave.
- 2. An approved leave of absence does not count against any time limits set on the student by their academic program and the student is not required to fulfill any requirements of their program while on an approved leave of absence.
- 3. During an approved voluntary leave of absence, the student is not considered a registered student, so the following apply:
  - a. Grades and Transcripts No letter grade will be issued for any course the student was enrolled in when the leave began. The student will be required to complete the appropriate form for the Office of the Registrar to drop their courses, and the student's record will reflect the applicable withdrawal assigned by their instructors/faculty members, even if the leave began after the withdrawal deadline.
  - b. Visas Students who do not have permanent residency in the U.S. need to contact the Office of International Students and Scholars immediately regarding their new status.
  - c. Financial Aid Loans, fellowships and other financial assistance may be subject to certain enrollment requirements. Students need to contact the Office of Financial Aid immediately regarding their new status.
  - d. Tuition and Fees A refund of tuition and fees to the student follows the same University's refund policy applicable to withdrawals.

- e. Housing Students who live in University housing may continue to do so for the remainder of the semester during which the leave of absence began. If the leave continues beyond that period, the student may not continue to live in University housing until they have reenrolled.
- f. Privileges and Facility Access Students are not eligible for graduate staff employment, participation in athletics (intercollegiate or intramural), or to serve on student government. The student's access to University services and facilities, such as University email, libraries, parking, recreational center, etc. is based on their registration status and whether they have an active student career account, so those privileges may be revoked while the student is not registered. Refer to the <u>Student Career Account Lifecycle</u> for more information.
- g. Health Insurance If the student carries a health insurance plan referred to them by the University, they need to report their new status to the PUSH Student Insurance Office.
- 4. The student must provide written notice of their intent to return from leave to the assistant/associate dean at least four weeks prior to the start of the session in which they plan to enroll. The assistant/associate dean may require additional documentation to support the student's reenrollment.

#### IV. CONCLUSION

The Department finds that the following areas/practices comply with the nondiscrimination provisions of Title IX and DOE Title IX implementing regulations: (1) the outreach and recruitment efforts of the Physics Department related to recruiting prospective graduate students; (2) the admissions process for applicants to the Physics Department's doctoral program; (3) the Physics Department's selection process for Teaching Assistants and Research Assistants; (4) Physics Department's nomination and selection process for achievement awards; and (5) the PA Department's administration of examinations and the dissertation approval process for PhD students.

The Department also finds that the University has satisfied the requirement under Title IX and DOE Title IX implementing regulations that it designate a Title IX Coordinator.

In light of, the new leave policy outlined above the Department finds that the Department of Physics at Purdue University has met the basic requirements of Title IX and DOE's implementing regulations.



#### Department of Energy Washington, DC 20585

December 7, 2016

Ms. Gretchen Dahlinger Means
Executive Director
Office of Equity and Diversity
University of Southern California
University Park Campus
2nd Floor Credit Union Building, M/C 0704
Los Angeles, CA 90089-0704

Dear Ms. Dahlinger Means:

The U.S. Department of Energy (the Department or DOE) is pleased to issue its final Title IX Compliance Report for the review it conducted of the Ming Hsieh Department of Electrical Engineering at the University of Southern California (USC) between May and October 2011. The report incorporates information which USC recently provided the DOE. The Department finds that USC met or exceeded the requirements of Title IX of the 1972 Education Amendments. A copy of the final report is enclosed for your records.

On behalf of the Department of Energy, I would like to thank you for your cooperation in the 2011 review and for the follow-up documentation that was provided recently to complete our review.

If you have additional questions regarding this report, please contact Ms. Jody TallBear, Attorney-Advisor in the Office of Civil Rights via telephone at 202-287-5362, or via e-mail at jody.tallbear@hq.doe.gov.

Sincerely,

LaDoris "Dot" Harris

Director

Office of Economic Impact and Diversity

Enclosure